1 2 3 4 5 6 7 8 9 110 111	FAEGRE DRINKER BIDDLE & REATE Rita Mansuryan (CA Bar No. 323034) rita.mansuryan@faegredrinker.com 1800 Century Park East, Suite 1500 Los Angeles, California 90067 Telephone: (310) 203-4000 Facsimile: (310) 229 1285  Sarah L. Brew (pro hac vice forthcoming) sarah.brew@faegredrinker.com Tyler A. Young (pro hac vice forthcoming) tyler.young @faegredrinker.com Rory F. Collins (pro hac vice forthcoming) rory.collins@faegredrinker.com 2200 Wells Fargo Center 90 South Seventh Street Minneapolis, MN 55402 Telephone: (612) 766-7000 Facsimile: (612) 766-1600  Counsel for Defendant McDonald's Corporation	I LLP
11	Webblaid & Corporation	
12	UNITED STATES DISTRICT COURT	
13	NORTHERN DISTRICT OF CALIFORNIA	
14	NORTHERN DISTRI	ici of California
15		
16	Eugina Harris, individually, and on behalf of all those similarly situated,	Case No. 3:20-cv-06533-LB
	Plaintiff,	Assigned to Magistrate Judge Laurel Beeler
17	,	DECLARATION OF RITA MANSURYAN IN SUPPORT OF
18	V.	STIPULATION AND [PROPOSED]
19	McDonald's Corporation,	ORDER TO EXTEND INITIAL DEADLINES AND CONTINUE CASE
20	Defendant.	MANAGEMENT CONFERENCE
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FAEGRE DRINKER BIDDLE & REATH LLP ATTORNEYS AT LAW MINNEAPOLIS DECL. OF RITA MANSURYAN ISO STIPULATION AND [PROPOSED] ORDER TO EXTEND INITIAL DEADLINES AND CONTINUE CASE MANAGEMENT CONFERENCE

Case No. 3:20-CV-06533-LB

## **DECLARATION OF RITA MANSURYAN**

I, Rita Mansuryan, declare as follows:

- 1. I am an attorney licensed to practice in the State of California, and an attorney with the law firm, Faegre Drinker Biddle & Reath LLP, attorneys for Defendant McDonald's Corporation ("Defendant") in the above-entitled action. I have personal knowledge of each and every fact set forth in this Declaration and, if called as a witness, could and would testify competently thereto.
- 2. This Declaration is being concurrently filed in support of the parties' Stipulation and [Proposed] Order to Extend Initial Deadlines and Continue Case Management Conference pursuant to L.R. 6-2 and 7-12.
- 3. On October 15, 2020, Plaintiff served the Complaint and Summons on Defendant via its registered agent. (*See* Dkt. No. 9.)
- 4. Under Rule 12(a)(1)(A)(i), Defendant's response to the Complaint currently is due November 5, 2020.
- 5. Defendant requires additional time to investigate the legal and factual basis of the claims and prepare a response to the Complaint.
- 6. Additionally, in the interest of efficient and orderly proceedings, the Parties would like an opportunity, after Defendant files its responsive pleading to the Complaint, to meet and confer and prepare a Rule 26(f) report.
- 7. The Parties respectfully submit that there is good cause for this request to modify the schedule, and that the request is not sought for the purpose of delay and will not cause prejudice in this matter.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on October 30, 2020, at Los Angeles, California.

/s/ Rita Mansuryan Rita Mansuryan

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